

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

ROBERT MOORE,

Plaintiff,

V.

U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT; U.S. CUSTOMS AND  
BORDER PROTECTION; AND  
U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES,

Defendants.

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Civil Action No. 3:19-CV-00279-DCG

## PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

Pursuant to the Court's Scheduling Order, as well as Fed. R. Civ. P. 26(a)(2)(B), Plaintiff hereby submit this his Expert Designations:

1. **Retained Experts:** Plaintiff does not anticipate the use of retained experts in this matter but reserves the right to supplement based on further production by Defendant.

- ## 2. Non-retained Attorneys' Fees Experts:

Should Plaintiff prevail in this lawsuit, he anticipates calling one or more of the following, in support of Plaintiff's application for attorneys' fees:

- A. Defendants' attorneys of record;
- B. **Lynn Coyle** and **Christopher C. Benoit**, Plaintiff's attorneys of record, 2515 N. Stanton St., El Paso, Texas 79902, (915) 532-5544.
- C. **John Mobbs**, 6350 Escondido Dr., Suite A-14, El Paso, Texas 79912 (915) 541-8810.

The above-named individuals are attorneys licensed in the State of Texas. They are expected to testify as to the reasonable and necessary attorney's fees and costs which should be awarded in this case. They are expected to base their opinion on their experience representing clients in litigation in El Paso, Texas as well as relevant case, statutory, and administrative law/precedent. They are not retained, employed or otherwise under the control of Plaintiff. Ms. Coyle and Mr. Benoit are Plaintiff's counsel in this matter and may testify as appropriate on attorney's fees expended or claimed by Plaintiff.

Plaintiff reserves the right to amend his expert designation and accompanying disclosures if new or additional facts or evidence are discovered throughout the litigation process. Plaintiff also reserves the right to elicit opinion testimony from any expert witness designated by any Defendant.

Respectfully submitted,

THE LAW OFFICE OF LYNN COYLE, PLLC  
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El Paso, Texas 79902  
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/s / Christopher Benoit

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*Attorneys for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2020, I delivered a true and correct copy of foregoing instrument to Defendant's attorneys of record, in accordance with the FEDERAL RULES OF CIVIL PROCEDURE, through the CMECF system.

/s / Christopher Benoit

CHRISTOPHER BENOIT